Hearing Date and Time: September 27, 2007 at 10:00 a.m. Response Date and Time: September 20, 2007 at 4:00 p.m.

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Attorneys for Creditor IR Epi Services, Inc.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11

**:** 

DELPHI CORPORATION, et al, : Case No. 05-44481 (RDD)

: (Jointly Administered)

Debtors.

(Claim No. 14236)

-----X

IR EPI SERVICES, INC.'S STATEMENT OF NON-OPPOSITION TO DEBTORS' TWENTIETH OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. § 502 AND FED. R. BANKR. P. 3007 TO CERTAIN (A) DUPLICATE AND AMENDED CLAIMS, (B) INSUFFICIENTLY DOCUMENTED CLAIMS, (C) CLAIMS NOT REFLECTED ON DEBTORS' BOOKS AND RECORDS, (D) UNTIMELY CLAIM, AND (E) CLAIMS SUBJECT TO MODIFICATION, TAX CLAIMS SUBJECT TO MODIFICATION, MODIFIED CLAIMS ASSERTING RECLAMATION, CONSENSUALLY MODIFIED AND REDUCED TORT CLAIMS, AND LIFT STAY PROCEDURES CLAIMS SUBJECT TO MODIFICATION, AS IT RELATES TO CLAIM NO. 14236

Creditor IR Epi Services, Inc. ("IR Epi Services") hereby submits its Statement of Non-Opposition to the Debtors' Twentieth Omnibus Objection Pursuant to 11 U.S.C. § 502 And Fed. R. Bankr. P. 3007 to Certain (A) Duplicate and Amended Claims, (B) Insufficiently Documented Claims, (C) Claims Not Reflected on Debtors' Books And Records, (D) Untimely Claim, and (E) Claims Subject To Modification, Tax Claims Subject to Modification, Modified Claims Asserting Reclamation, Consensually Modified And Reduced Tort Claims, and Lift Stay Procedures Claims Subject to Modification (the "Twentieth Omnibus Claims Objection").

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Through their Twentieth Omnibus Claims Objection, the Debtors assert that they

have identified claims that state the incorrect amount or are overstated (the "Claims Subject To

Modification") on Exhibit E thereof. IR Epi Services timely filed a Proof of Claim in the

Debtors' bankruptcy cases, which is identified by the Debtors' as claim no. 14236 (the "IR Epi

Claim"), and which is listed on Exhibit E to the Twentieth Omnibus Claims Objection as a Claim

Subject to Modification. The Debtors' do not assert any intention to seek to disallow or expunge

the IR Epi Claim in the Twentieth Omnibus Objection. Rather, the Debtors' seek to modify the

amount of the IR Epi Claim based on the Debtors' determination of its liability to IR Epi

Services.

As stated in the Twentieth Omnibus Claims Objection, the Debtors' have

determined that the IR Epi Claim against Delphi Automotive Systems, LLC, should be reduced

from \$588,927.08, and modified to reflect a claim in the amount of \$488,834.60. IR Epi

Services does not object to such modification of the IR Epi Claim (claim no. 14236) against

Delphi Automotive Systems, LLC, as requested by the Debtors in the Twentieth Omnibus

Claims Objection.

Dated: September 19, 2007

New York, New York

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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